## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHRISTOPHER CARBONE,	: : CIVIL ACTION
Plaintiff,	: : No. 2:23-CV-5164
v.	:
HOLY FAMILY UNIVERSITY	: :
Defendant.	: _ <b>:</b>
<u>ORDER</u>	
THIS MATTER having been brought before the Court on Plaintiff's Motion for Leave	
to File Under Seal, and in consideration of Plaintiff's Motion and good cause shown, it is hereby	
<b>ORDERED</b> that Plaintiff's Motion is <b>GRANTED</b> .	
Date:	

, U.S.D.J.

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHRISTOPHER CARBONE,

**CIVIL ACTION** 

Plaintiff,

No. 2:23-CV-5164

v.

: JURY TRIAL DEMANDED

HOLY FAMILY UNIVERSITY

:

Defendant.

## PLAINTIFF'S MOTION FOR LEAVE TO FILE COMPLAINT UNDER SEAL

Plaintiff Christopher Carbone, by and through his attorneys van der Veen, Hartshorn, and Levin, hereby moves this Honorable Court for permission to file the complaint attached hereto under seal pursuant to Local Rule of Civil Procedure 5.1.2(6), and in support thereof, avers as follows:

- Plaintiff initiated this suit against Defendant Holy Family University as a result of its discriminatory handling of a Title IX investigation in which a student falsely accused Plaintiff of sexual assault.
- 2. While Plaintiff adamantly maintains his innocence with respect to these allegations, he recognizes the importance of preserving confidentiality with respect to reports of sexual assault and the related investigations.
- 3. Plaintiff's Complaint refers to the alleged victim by a pseudonym; however, there may be sufficient details contained therein to deduce her identity.
- 4. Plaintiff's Complaint also names individuals interviewed throughout the Title IX investigation and the substance of the information each provided.
- 5. Neither the alleged victim, nor the individuals who offered information to Title IX investigators are named in the above-referenced suit.

- 6. The information contained in the Complaint related to these non-parties is pertinent and necessary to the resolution of Plaintiff's claims.
- 7. As such, Plaintiff respectfully requests that he be permitted to file his Complaint under seal.

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court grant his Motion and enter an Order in the form attached hereto.

Respectfully Submitted,

Date: December 29, 2023 By:

Kaitlin McCaffrey Bruce L. Castor, Jr.

I.D. No. 46370

Kaitlin C. McCaffrey

I.D. No. 329960

Attorneys for Plaintiffs 1219 Spruce Street

Philadelphia, PA 19107

P: (215) 546-1000 F: (215) 546-8529